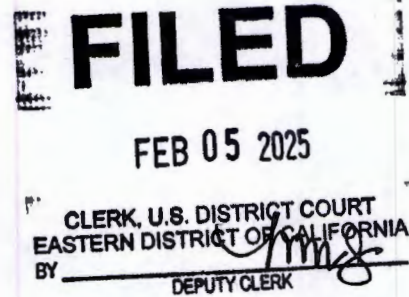


PRO SE LITIGANT

Name Richard Louis Brown - PRO SE LITIGANT  
Street Address 3225 43rd Street  
City and County Sacramento, Sacramento  
State and Zip Code California 95817  
Telephone Number 408-207-2339  
Email richard.brown7437@yahoo.com



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

Richard Louis Brown

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-against-

SEIU Local 1000

Service Employees International Union (SEIU)

California State Employees Association (CSEA)

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

First Amended Complaint for a Civil Case

Case No. 2:24-cv-03276-DJC-JDP

Jury Trial: ☒ Yes ☐ No

*(check one)*

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Richard Louis Brown</u>
Street Address	<u>3225 43rd Street</u>
City and County	<u>Sacramento, Sacramento County</u>
State and Zip Code	<u>California, 95817</u>
Telephone Number	<u>408-207-2339</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>SEIU Local 1000</u>
Job or Title (if known)	<u>California's largest public sector employees' union</u>
Street Address	<u>1808 14th Street</u>
City and County	<u>Sacramento, Sacramento County</u>
State and Zip Code	<u>California, 95811</u>
Telephone Number	<u>866-471-7348</u>

**Defendant No. 2**

Name	<u>Service Employees International Union (SEIU)</u>
Job or Title (if known)	<u>U.S. international labor union</u>
Street Address	<u>1800 Massachusetts Ave NW</u>
City and County	<u>Washington, DC</u>
State and Zip Code	<u>Washington, DC 20036</u>
Telephone Number	<u>202-730-7184</u>



## Defendant No. 3

Name	<u>California State Employees Association (CSEA)</u>
Job or Title (if known)	<u>California federation of four affiliated organizations</u>
Street Address	<u>3000 Advantage Way</u>
City and County	<u>Sacramento, Sacramento County</u>
State and Zip Code	<u>California, 95834</u>
Telephone Number	<u>(916) 444-8134</u>

## Defendant No. 4

Name	<u></u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>

**II. Basis for Jurisdiction**

Federal Courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in Federal Court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same state as any plaintiff.

What is the basis for Federal Court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

U.S. Constitution - 1st, 8th, 14th and 15th Amendments Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

U.S. Constitution - 1st, 8th, 14th and 15th Amendments

Federal Rules of Civil Procedure Rule 8(f) General Rules of Pleading

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

**1. The Plaintiff(s)**

**a. If the plaintiff is an individual**

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)**

**a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

**b. If the defendant is a corporation**

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**3. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court, because (explain):



### **III. Statement of Claim - page 1 of 2**

SEIU Local 1000 with the full assistance/cooperation of Service Employees International Union (SEIU) et California State Employees Association (CSEA) and all of their lawyers (The Cartel Oligarchy) violated numerous Local 1000 internal governance and California state laws, Plaintiff, Richard Louis Brown was illegally removed as Local 1000 President. Local 1000 did NOT have the legal authority to suspend and remove Mr. Brown and his Board voting/job representation rights from office on February 27, 2022 and January 7, 2023, respectively. Local 1000, SEIU et CSEA interference was a direct representation of judicial misconduct that occurred from August 19, 2021, to the present. SEIU et CSEA misused our legal system with malicious intentions to circumvent legally established laws.

**Richard Louis Brown's First Amendment Rights - Freedom of Speech & Association** was violated by The Cartel Oligarchy eliminating President Brown and silencing members' voices for President Brown's 10 Point Platform to remove political spending by Local 1000. The Cartel Oligarchy also removed Mr. Brown's voting/job representation rights and due process by also refusing to fully indemnify Mr. Brown on July 1, 2022. President Brown was removed in retaliation for his speech and actions that opposed The Cartel Oligarchy's leadership structure and policies, which is a violation of his right to free speech. The Cartel Oligarchy's refusal to indemnify him while supporting other legal defenses (April and June 2022) within the organization was an attempt to punish dissenting viewpoints.

**Richard Louis Brown's Eighth Amendment (Cruel and Unusual Punishment)** was violated by The Cartel Oligarchy's illegal Suspension and Removal Process that was conducted in a way that inflicted excessive and unfair punishment on President Brown. These disciplinary actions led to unreasonable hardship, public defamation, and financial ruin for President Brown. This resulted in a forced early retirement on April 1, 2024, for President Brown when his term did not end until June 30, 2024, with no opportunity to seek reelection which is an cruel and unusual punishment was for any alleged wrongdoings committed by President Brown.

**Richard Louis Brown's Fourteenth Amendment (Due Process & Equal Protection)** violated by The Cartel Oligarchy's illegal due process as President Brown was suspended on February 27, 2022, without proper procedures, including the lack of a legitimate and fair hearing, failure to follow internal policies, and denial of notice or legal recourse through December 2022. The Cartel Oligarchy allowed certain individuals to receive preferential treatment such as; financial support for legal fees in April and June 2022 while President Brown was denied similar protections, which is violation of equal protection under the law.

**Richard Louis Brown's Fifteenth Amendment (Voting Rights)** were violated The Cartel Oligarchy's undemocratic process within the Local 1000 that was undermined by the illegal restructuring of leadership, preventing members from having a legitimate say in their governance in 2023. Illegal leadership elections held in May 2024 were manipulated and decisions were made without member votes. This is a violation of fair electoral rights within the Local 1000 and CSEA.

### III. Statement of Claim - page 2 of 2

#### IN A SHORT BRIEF AND CONCISE SUMMARY

Plaintiff Richard Louis Brown was elected as the President of SEIU Local 1000 in May 2021 under Local 1000 Bylaws (2018), Policy File (2020)m and California corporate law. On February 25, 2022, President Brown suspended the official duties of three Statewide Vice Presidents (The Cartel Oligarchy) for actions deemed detrimental to the union. In response, the three Statewide Vice Presidents retaliated by attempting to suspend President Brown on February 27, 2022, without following the proper disciplinary procedures required by Local 1000's governing documents.

The retaliation against President Brown culminated in his removal from office on January 7, 2023, through an unlawful process that violated the Local 1000 Bylaws (2018), Policy File (2020) and California corporate law. The Defendants, SEIU Local 1000, SEIU and CSEA along with their attorneys (The Cartel Oligarchy) and individual union officials, created an unauthorized "Chair" position to usurp the powers of the President without first obtaining general membership approval. Additionally, they refused to indemnify President Brown for legal expenses while simultaneously approving payments for their own legal defense, violating corporate fiduciary obligations.

As a result of these actions, all union decisions including but not limited to the union's leadership structure, collective bargaining agreements, and elections conducted after February 27, 2022, were invalid. This is due to the Local 1000 President having the ultimate and sole powers including but not limited to 1) calling ALL meetings, 2) Being the Chief Negotiator for ALL contracts, 3) Running new leadership elections and 4) Suspending ANY member(s) regardless of their job title or position for their actions. The defendants' conduct violated **President Brown's First, Eighth, Fourteenth, and Fifteenth Amendment rights** by unlawfully suspending and removing him from office, suppressing member democracy, and engaging in retaliatory actions.

Plaintiff seeks 1) immediate reinstatement as President of SEIU Local 1000 and immediate reinstatement to California state service without any limitations, 2) nullification of the 2023 - 2026 labor contract ratification and 2024 leadership elections, 3) financial damages, and 4) court-ordered policy changes to ensure compliance with Local 1000 Bylaws (2018), Policy File (2020) and constitutional protections.

Please see **EXHIBIT A** regarding the Form HR1 and Suspension Letters along with Cell Phone Text Message, and **Exhibit B** -Four Warning Letters that was sent by registered mail to The Cartel Oligarchy.

**Exhibit A** provides dated, clearly labeled, factually and indisputable evidence illustrates that The Cartel Oligarchy was duly informed that the three Statewide Vice Presidents were correctly suspended of their official duties by the Plaintiff on February 25, 2022, but their memberships were still protected per the Plaintiff's February 26, 2022, at 10:08am Cell Phone Text message to The Cartel Oligarchy - Local 1000 Chief Counsel, Anne Giese and her February 27, 2022, at 7:14pm affirmative response.

**Exhibit B** also clearly shows that the Plaintiff warned The Cartel Oligarchy on four different occasions that only the Local 1000 President had the sole power to call meetings and and actions taken from non-sanctioned meetings were illegal, null and void, and would result in disciplinary action with possible removal from Local 1000. It should be noted that the First Warning Letter dated September 13, 2021, was actually signed by The Cartel Oligarchy - Local 1000 Chief Counsel, Anne Giese.





**SEIU LOCAL 1000 HEARING REQUEST FORM (HR1)**  
(Complaint for Discipline by a Member against another Member)

Your Name: DLC/Region: Richard Louis Brown

Bargaining Unit: State Department: Bargaining Unit 1; Debt and Investment Advisory Commission

Mailing Address: 3225 43<sup>rd</sup> Street, Sacramento CA 95817

Work Phone: 408-207-2339

Home Phone: 408-207-2339

Complaint Against: David Jimenez

SEIU Local 1000/DLC/BUNC Position (i.e., member, DLC President, etc.) Vice President/Secretary Treasurer

Policy File Section(s) violated (see Section 9.0.00 et seq. of SEIU Local 1000 Policy File) 9.0.00 DISCIPLINE 9.0.01 Criteria and Procedures for Disciplinary Action Disciplinary action may be taken for the following reasons: (k) Behavior which is determined by the hearing panel or officer to be of such a nature that it causes discredit to Local 1000;

Nature Problem (include specifics – e.g. dates, times, etc. – attach additional sheets if necessary): On Wednesday, February 23, 2022 at 6:08pm an email was sent out exposing that David Jimenez was attempting to remove myself, Richard Louis Brown, the President of Local 1000 from my office without any just cause or legal right. This behavior is leading to the discredit of Local 1000.

Witnesses/Documents – please list all witnesses (name and phone number) and relevant documents in your possession: Email from Theresa Taylor to myself on Wednesday, February 23, 2022 at 6:08pm regarding the above mentioned matter. Email from David Jimenez on Thursday February 24, 2022 at 11:09am.

**Headquarters Information:**

Date Received: \_\_\_\_\_ Local 1000 President/Vice Pres.-Sec. Treasurer: \_\_\_\_\_

Referred to Hearing Officer/Panel on: \_\_\_\_\_

Hearing Officer/Panel Assigned: \_\_\_\_\_

Date/Time/Location of Hearing: \_\_\_\_\_

SEIU Local 1000 Action/Date: \_\_\_\_\_

Disposition Letter Mailed: \_\_\_\_\_



From: [REDACTED]  
 Sent: [REDACTED]  
 To: [REDACTED]  
 Subject: [REDACTED]

From: David Jimenez <ssa\_dave04@hotmail.com>

Sent: Thursday, February 24, 2022 11:09 AM

To: Theresa Taylor <thetay456@gmail.com>; leonard.seitz@dot.ca.gov; Andrew Vasicek <andrewvasicek@gmail.com>; Angelique Moreno <angeliquems@aol.com>; Bill Hall <william.r.hall@dot.ca.gov>; Brad Willis <mojavekroc@msn.com>; Brown, Richard <RLBrown@SEIU1000.org>; Carolelynn Leonardo-Valdriz <caroleseiu1000@gmail.com>; Carolyn Leonardo-Valdriz <cleonardo23@gmail.com>; Charity Regalado <lakersgyrll@yahoo.com>; Christina Evitt <christinadlc751@gmail.com>; Cindy Doyel <CindyDoyelUnion@gmail.com>; Cullen <cullenkral@gmail.com>; Cynthia Vo <risewithlabor@gmail.com>; Darrell Kirby <EXCTME@AOL.COM>; Daunette Sparkman <bigdtiggerds69@yahoo.com>; David Johnson <davidrjohnson055@gmail.com>; David Smith <yourunion2019@gmail.com>; Deleon Secrest <his\_story1865@yahoo.com>; DeLonne Johnson <delonnelj@frontiernet.net>; ED Page <dv8yingyang@gmail.com>; Irene Greene <Ireneseiu1000@gmail.com>; Eileen Boughton <Dlc789pres@outlook.com>; Erika Chhatarpal <whitemamba.ev@gmail.com>; Francina Stevenson <rocina@frontiernet.net>; Garth Underwood <seiu1000dlc710dbur@yahoo.com>; Heather Kessler <president.dlc788@gmail.com>; Hoang-Van 'Van' Nguyen <van.nguyen\_seiu1000@outlook.com>; Imani Dhahabu <iidhahabu@yahoo.com>; Jack Dean <seiujack.dean@gmail.com>; Jennifer Cordova <cordmama@live.com>; Jerome Washington <Jerome\_wash@sbcglobal.net>; Joycelyn Odom <jbetboopin3@gmail.com>; Karen Franklin <KarenFranklin121@gmail.com>; Karen Jefferies <kjefferies08@gmail.com>; Kerri Riley <kerricriley@icloud.com>; Kevin Healy <healykm@hotmail.com>; Kim Coward <cowart12568@gmail.com>; Latasha Brown <lat\_jin@hotmail.com>; Leonard Seitz <seitz\_l@pacbell.net>; Lisa Davis <kcvwmom@yahoo.com>; Maria Blaine <mariablaine39@gmail.com>; Mary De La Cruz <mdlc056@gmail.com>; Miche Roy <MSMRoy1976@Gmail.com>; Melissa Del Rosario <Mistydelrosario3@hotmail.com>; Monica Rodriguez <moneyrodriguez@hotmail.com>; Nancy Martinez( Contact) <nancymartinez\_6@hotmail.com>; Naomi Musembi-Johnson <musembi.rn@gmail.com>; Neice Davis <neice\_davis@yahoo.com>; Ramon Naverrette <dlc747president@gmail.com>; Richard Wake <rwake61@yahoo.com>; Robert Gilbert <rgilbert.seiu1000@gmail.com>; Ruth Ibarra <dlc787.president@gmail.com>; Ruth Kiker <ruthkiker@charter.net>; Shrhonda Ward <seiu1000dlc766@gmail.com>; Steven Alari <membersfirst@gmail.com>; Susan Rodriguez <rodriguezsusan@hotmail.com>; Tetence Hibbard <terrygh50@hotmail.com>; Tommy Rico <trico60@hotmail.com>; Walls, Anica <awalls@SEIU1000.org>; Wanda Yanez <learnwisdom@sbcglobal.net>; eric\_murray03@msn.com; vseastrongseiu@gmail.com; xicanery@hotmail.com; chair.seiu1000 <chair.seiu1000@gmail.com>; Nicole Solovskoy <dlc770president@gmail.com>

Subject: Fw: Update to follow

Good Morning all!

Let us set the record straight. The email sent out yesterday evening by Theresa Taylor for Bill Hall is mostly inaccurate. Over the past week and a half there have been disturbing discoveries communicated to us by both staff and members. Here are the facts:

- A unilateral directive was issued late last week to the URC Staff notifying them of changes that would take place immediately. Since then there have been modifications but there is still MUCH confusion over who is to act and when.
- Legal matters have escalated and Local 1000 is faced with four lawsuits. The Executive Committee is being intentionally excluded when there is an obvious conflict of interest.

It is these two reasons we reached out to VP Irene Green on Tuesday. Irene expressed that this information was not totally new to her but she would need time to process the information and was not willing to sign on for suspension. In spite of the latest developments:



It is these two reasons we reached out to VP Irene Green on Tuesday. Irene expressed that this information was not totally new to her but she would need time to process the information and was not willing to sign on for suspension. In spite of the latest developments:

- Staff taking concerted action in response to new URC directives. On Tuesday 2/22/22 64% of staff called out.
- Increase escalation with now 75% of staff called out on 2/23/22.
- Settlement talks were offered on two of four lawsuits with no notice to Executive Committee. This will potentially add significant costs to Local 1000.

In trying to make the best decision for our members and our local we attempted to reach out to Bill Hall so he could perhaps nudge Irene to act. His "position" was that he advised Irene not to sign. He wanted us to publicly acknowledge the actions of the supposed board meeting that took place in October 2021. We refused and said we DO NOT agree with the October board meeting and that once Irene signed the document to suspend Richard we would call an emergency board meeting to address two items. 1) The suspension and 2) the agenda items put forth in October. We want the entire board under no threats, to review, discussion and take a vote. The results of which would be honored by us. We do not feel going back to that confusing period and just accepting these changes to our policy file and bylaws is appropriate.

We do not agree with Bill Hall's legal assessment that to finalize the suspension of the President per Article 9.0.04 we must go to court. Our policy file clearly outlines a path that allows for temporary suspending the statewide president and there are clear lines of succession as well. A court would first consider that the administrative procedures were followed or at least attempted.

To our knowledge a successful suspension of the local president has never been done before. The attempt made in 2018 on the prior local president was done during a board meeting and was not successful because the board did not support it, including Bill Hall. As stated correctly this would not remove Richard from the board, which is understood and is not the primary objective. Our goal is to stop Richard from causing further damage to our represented employees and staff through his unilateral actions.

These discussions and actions have not been easy. Our intension has always been to get the necessary work done with Richard as president. We have tried to advice and counsel him on decisions based on our experiences as union member leaders. It is our responsibility to hold him accountable and based on the recent information coming to light that is our intent. The failure to act by VP Irene Green and the position Bill Hall has taken, indicate to us this was never about Richard but rather an unwillingness to accept the results of the election. Their focus on us accepting the results of the October meeting and placing Bill Hall or any chairman at the helm of the Local 1000 with no direct vote from the entire membership is troubling to say the least, especially when all executive officers are directly elected from the entire membership.

In Solidarity,

David Jimenez  
VP/Secretary Treasurer  
SEIU Local 1000  
(916)690-7418

Anica Walls  
VP Representation/Organizing SEIU Local 1000  
(916)804-5338



On Feb 23, 2022, at 6:00 PM, Theresa Taylor <thetay456@gmail.com> wrote:

Hi folks! Bill Hall asked me to send this out to the Board of Directors for him. Theresa Taylor

I wanted to give everyone a real-time update. It has been a little crazy right now.

VP Anica and David called me today and they felt there was no time to waste to get rid of Richard Louis Brown and remove him using the Policy File Article 9.0.04 *Suspension of President*, which provides:

***"If, in the opinion of the Vice President/Secretary-Treasurer, Vice President for Organizing/Representation, and Vice President for Bargaining, the action of the President is such as to pose an immediate threat to the welfare of Local 1000, the other Officers may summarily suspend the President until the procedures established in the Policy File are concluded. If written charges are not filed within ten days, the suspension is terminated."***

Unfortunately, they don't truly understand how Article 9.0.04 works in that the three VPs would still have to go to court to finalize this action. We have been down that road before and it was ineffective in the short term. Further, it is just a suspension of the president, not his removal.

As President Brown has done in the past, he can, and likely will, just ignore the requirements of the Policy File, which in this case would result in his immediate suspension. This leaves SEIU Local 1000 and its members vulnerable for the ongoing misconduct and waste of union resources. However, there is light at the end of the tunnel. We are on track and have a plan to protect SEIU Local 1000, consistent with the decision of the majority of the Board back in October 2021.

Our timeline is to be in the Sacramento Superior Court by the middle of next week on an urgent hearing to get this resolved. While he would likely ignore the three VPs, President Brown cannot ignore the power of a Court Order, and we are on track to get that protective order.

VPs David Jimenez and Anica Walls may call for a special board meeting as they are in damage control mode after supporting Brown, to date. They do not support or agree with the Board Action of October 17, and 18, 2021.

Through solidarity, we can get back on track for the protection of our members and our union. I am with you.

William "Bill" Hall  
Chair of the Board  
SEU Local 1000





February 25, 2022

Via Email

[ssa\\_dave04@hotmail.com](mailto:ssa_dave04@hotmail.com)

[Djimenez@seiu1000.org](mailto:Djimenez@seiu1000.org) &

Certified Mail

7020 2450 0001 2112 3495

David Jimenez  
Vice President/Secretary Treasurer  
SEIU Local 1000  
1808 14<sup>th</sup> Street  
Sacramento, CA 95818

RICHARD  
LOUIS BROWN  
President

DAVID JIMENEZ  
Vice President/  
Secretary-Treasurer

ANICA WALLS  
Vice President for  
Organizing/Representation

IRENE GREEN  
Vice President for Bargaining

**RE: SUSPENSION OF OFFICER DUTIES**

Dear Mr. Jimenez,

It has come to my attention that you have met with and provided confidential information to Board of Director Bill Hall in an effort to remove me from my position without any just cause or legal right.

It is my opinion that the above actions pose an immediate threat to the welfare of Local 1000. Therefore, you are hereby suspended under the authority of Local 1000 Policy file section 9.0.03 which states "When, in the opinion of the President, the actions of the member are such as to impose an immediate threat to the welfare of Local 1000, the President may summarily suspend the member until the procedures established in the Policy File are concluded. If written charges are not filed within ten days, the suspension shall be terminated."

You are to conduct no Local 1000 business while on suspension.

Sincerely,

A handwritten signature in black ink that reads "Richard Louis Brown". The signature is written in a cursive, flowing style.

Richard Louis Brown  
President  
SEIU Local 1000  
1808 14<sup>th</sup> St. Sacramento, CA 95811  
[RLBrown@seiu1000.org](mailto:RLBrown@seiu1000.org)

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
SOC, CLC

1808 14<sup>th</sup> Street  
Sacramento, CA 95811

866.471.SEIU (7348)  
[www.seiu1000.org](http://www.seiu1000.org)



**SEIU LOCAL 1000 HEARING REQUEST FORM (HR1)**  
(Complaint for Discipline by a Member against another Member)

Your Name: DLC/Region: Richard Louis Brown

Bargaining Unit: State Department: Bargaining Unit 1; Debt and Investment Advisory Commission

Mailing Address: 3225 43<sup>rd</sup> Street, Sacramento CA 95817

Work Phone: 408-207-2339

Home Phone: 408-207-2339

Complaint Against: Anica Walls

SEIU Local 1000/DLC/BUNC Position (i.e., member, DLC President, etc.) Vice President for Organizing/Representation

Policy File Section(s) violated (see Section 9.0.00 et seq. of SEIU Local 1000 Policy File) 9.0.00 DISCIPLINE 9.0.01 Criteria and Procedures for Disciplinary Action Disciplinary action may be taken for the following reasons: (k) Behavior which is determined by the hearing panel or officer to be of such a nature that it causes discredit to Local 1000;

Nature Problem (include specifics – e.g. dates, times, etc. – attach additional sheets if necessary): On Wednesday, February 23, 2022 at 6:08pm an email was sent out exposing that Anica Walls was attempting to remove myself, Richard Louis Brown, the President of Local 1000 from my office without any just cause or legal right. This behavior is leading to the discredit of Local 1000.

Witnesses/Documents – please list all witnesses (name and phone number) and relevant documents in your possession: Email from Theresa Taylor to myself on Wednesday, February 23, 2022 at 6:08pm regarding the above mentioned matter. Email from David Jimenez on Thursday February 24, 2022 at 11:09am.

**Headquarters Information:**

Date Received: \_\_\_\_\_ Local 1000 President/Vice Pres.-Sec. Treasurer: \_\_\_\_\_

Referred to Hearing Officer/Panel on: \_\_\_\_\_

Hearing Officer/Panel Assigned: \_\_\_\_\_

Date/Time/Location of Hearing: \_\_\_\_\_

SEIU Local 1000 Action/Date: \_\_\_\_\_

Disposition Letter Mailed: \_\_\_\_\_



From: [REDACTED]  
 Sent: [REDACTED]  
 To: [REDACTED]  
 Subject: [REDACTED]

From: David Jimenez <ssa\_dave04@hotmail.com>

Sent: Thursday, February 24, 2022 11:09 AM

To: Theresa Taylor <thetay456@gmail.com>; leonard.seitz@dot.ca.gov; Andrew Vasicek <andrewvasicek@gmail.com>; Angelique Moreno <angeliquems@aol.com>; Bill Hall <william.r.hall@dot.ca.gov>; Brad Willis <mojavekroc@msn.com>; Brown, Richard <RLBrown@SEIU1000.org>; Carolelynn Leonardo-Valdrez <caroleseiu1000@gmail.com>; Carolyn Leonardo-Valdrez <cleonardo23@gmail.com>; Charity Regalado <lakersgyrl@yahoo.com>; Christina Evitt <christinadlc751@gmail.com>; Cindy Doyel <CindyDoyelUnion@gmail.com>; Cullen <cullenkral@gmail.com>; Cynthia Vo <risewithlabor@gmail.com>; Darrell Kirby <EXCTME@AOL.COM>; Daunette Sparkman <bigdtiggerds69@yahoo.com>; David Johnson <davidjohnson055@gmail.com>; David Smith <yourunion2019@gmail.com>; Deleon Secrest <his\_story1865@yahoo.com>; DeLonne Johnson <delonnelj@frontiernet.net>; ED Page <dv8yingyang@gmail.com>; Irene Greene <ireneseiu1000@gmail.com>; Eileen Boughton <Dlc789pres@outlook.com>; Erika Chhatarpal <whitemamba.ev@gmail.com>; Francina Stevenson <rocina@frontiernet.net>; Garth Underwood <seiu1000dlc710dbur@yahoo.com>; Heather Kessler <president.dlc788@gmail.com>; Hoang-Van 'Van' Nguyen <van.nguyen\_seiu1000@outlook.com>; Imani Dhahabu <iidhahabu@yahoo.com>; Jack Dean <seiujack.dean@gmail.com>; Jennifer Cordova <cordmama@live.com>; Jerome Washington <Jerome\_wash@sbcglobal.net>; Joycelyn Odom <jbetboopin3@gmail.com>; Karen Franklin <KarenFranklin121@gmail.com>; Karen Jefferies <kjefferies08@gmail.com>; Kerri Riley <kerricriley@icloud.com>; Kevin Healy <healykm@hotmail.com>; Kim Coward <cowart12568@gmail.com>; Latasha Brown <lat\_jin@hotmail.com>; Leonard Seitz <seitz\_l@pacbell.net>; Lisa Davis <kcvwmom@yahoo.com>; Maria Blaine <mariablaine39@gmail.com>; Mary De La Cruz <mdlc056@gmail.com>; Miche Roy <MSMRoy1976@gmail.com>; Melissa Del Rosario <Mistydelrosario3@hotmail.com>; Monica Rodriguez <moneyrodriguez@hotmail.com>; Nancy Martinez (Contact) <nancymartinez\_6@hotmail.com>; Naomi Musembi-Johnson <musembi.rn@gmail.com>; Neice Davis <neice\_davis@yahoo.com>; Ramon Naverrette <dlc747president@gmail.com>; Richard Wake <rwake61@yahoo.com>; Robert Gilbert <rgilbert.seiu1000@gmail.com>; Ruth Ibarra <dlc787.president@gmail.com>; Ruth Kiker <ruthkiker@charter.net>; Shrhonda Ward <seiu1000dlc766@gmail.com>; Steven Alari <membersfirst@gmail.com>; Susan Rodriguez <rodriguezsusan@hotmail.com>; Tetence Hibbard <terrygh50@hotmail.com>; Tommy Rico <trico60@hotmail.com>; Walls, Anica <awalls@SEIU1000.org>; Wanda Yanez <learnwisdom@sbcglobal.net>; eric\_murray03@msn.com; vseastrongseiu@gmail.com; xicanery@hotmail.com; chair.seiu1000 <chair.seiu1000@gmail.com>; Nicole Solovskoy <dlc770president@gmail.com>

Subject: Fw: Update to follow

Good Morning all!

Let us set the record straight. The email sent out yesterday evening by Theresa Taylor for Bill Hall is mostly inaccurate. Over the past week and a half there have been disturbing discoveries communicated to us by both staff and members. Here are the facts:

- A unilateral directive was issued late last week to the URC Staff notifying them of changes that would take place immediately. Since then there have been modifications but there is still MUCH confusion over who is to act and when.
- Legal matters have escalated and Local 1000 is faced with four lawsuits. The Executive Committee is being intentionally excluded when there is an obvious conflict of interest.

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- Increase escalation with now 75% of staff called out on 2/23/22.
- Settlement talks were offered on two of four lawsuits with no notice to Executive Committee. This will potentially add significant costs to Local 1000.

In trying to make the best decision for our members and our local we attempted to reach out to Bill Hall so he could perhaps nudge Irene to act. His "position" was that he advised Irene not to sign. He wanted us to publicly acknowledge the actions of the supposed board meeting that took place in October 2021. We refused and said we DO NOT agree with the October board meeting and that once Irene signed the document to suspend Richard we would call an emergency board meeting to address two items. 1) The suspension and 2) the agenda items put forth in October. We want the entire board under no threats, to review, discussion and take a vote. The results of which would be honored by us. We do not feel going back to that confusing period and just accepting these changes to our policy file and bylaws is appropriate.

We do not agree with Bill Hall's legal assessment that to finalize the suspension of the President per Article 9.0.04 we must go to court. Our policy file clearly outlines a path that allows for temporary suspending the statewide president and there are clear lines of succession as well. A court would first consider that the administrative procedures were followed or at least attempted.

To our knowledge a successful suspension of the local president has never been done before. The attempt made in 2018 on the prior local president was done during a board meeting and was not successful because the board did not support it, including Bill Hall. As stated correctly this would not remove Richard from the board, which is understood and is not the primary objective. Our goal is to stop Richard from causing further damage to our represented employees and staff through his unilateral actions.

These discussions and actions have not been easy. Our intension has always been to get the necessary work done with Richard as president. We have tried to advice and counsel him on decisions based on our experiences as union member leaders. It is our responsibility to hold him accountable and based on the recent information coming to light that is our intent. The failure to act by VP Irene Green and the position Bill Hall has taken, indicate to us this was never about Richard but rather an unwillingness to accept the results of the election. Their focus on us accepting the results of the October meeting and placing Bill Hall or any chairman at the helm of the Local 1000 with no direct vote from the entire membership is troubling to say the least, especially when all executive officers are directly elected from the entire membership.

In Solidarity,

David Jimenez  
VP/Secretary Treasurer  
SEIU Local 1000  
(916)690-7418

Anica Walls  
VP Representation/Organizing SEIU Local 1000  
(916)804-5338



On Feb 23, 2022, at 6:00 PM, Theresa Taylor <thetay456@gmail.com> wrote:

Hi folks! Bill Hall asked me to send this out to the Board of Directors for him. Theresa Taylor

I wanted to give everyone a real-time update. It has been a little crazy right now.

VP Anica and David called me today and they felt there was no time to waste to get rid of Richard Louis Brown and remove him using the Policy File Article 9.0.04 *Suspension of President*, which provides:

***"If, in the opinion of the Vice President/Secretary-Treasurer, Vice President for Organizing/Representation, and Vice President for Bargaining, the action of the President is such as to pose an immediate threat to the welfare of Local 1000, the other Officers may summarily suspend the President until the procedures established in the Policy File are concluded. If written charges are not filed within ten days, the suspension is terminated."***

Unfortunately, they don't truly understand how Article 9.0.04 works in that the three VPs would still have to go to court to finalize this action. We have been down that road before and it was ineffective in the short term. Further, it is just a suspension of the president, not his removal.

As President Brown has done in the past, he can, and likely will, just ignore the requirements of the Policy File, which in this case would result in his immediate suspension. This leaves SEIU Local 1000 and its members vulnerable for the ongoing misconduct and waste of union resources. However, there is light at the end of the tunnel. We are on track and have a plan to protect SEIU Local 1000, consistent with the decision of the majority of the Board back in October 2021.

Our timeline is to be in the Sacramento Superior Court by the middle of next week on an urgent hearing to get this resolved. While he would likely ignore the three VPs, President Brown cannot ignore the power of a Court Order, and we are on track to get that protective order.

VPs David Jimenez and Anica Walls may call for a special board meeting as they are in damage control mode after supporting Brown, to date. They do not support or agree with the Board Action of October 17, and 18, 2021.

Through solidarity, we can get back on track for the protection of our members and our union. I am with you.

**William "Bill" Hall  
Chair of the Board  
SEU Local 1000**





February 25, 2022

Via Email

[Anica.g.walls@gmail.com](mailto:Anica.g.walls@gmail.com);

[Awalls@seiu1000.org](mailto:Awalls@seiu1000.org) &

Certified Mail

7020 2450 0001 2112 3501

Anica Walls  
Vice President for Organizing/Representation  
SEIU Local 1000  
1808 14<sup>th</sup> Street  
Sacramento, CA 95818

RICHARD  
LOUIS BROWN  
President

DAVID JIMENEZ  
Vice President/  
Secretary-Treasurer

ANICA WALLS  
Vice President for  
Organizing/Representation

IRENE GREEN  
Vice President for Bargaining

**RE: SUSPENSION OF OFFICER DUTIES**

Dear Ms. Walls,

It has come to my attention that you have met with and provided confidential information to Board of Director Bill Hall in an effort to remove me from my position without any just cause or legal right.

It is my opinion that the above actions pose an immediate threat to the welfare of Local 1000. Therefore, you are hereby suspended under the authority of Local 1000 Policy file section 9.0.03 which states "When, in the opinion of the President, the actions of the member are such as to impose an immediate threat to the welfare of Local 1000, the President may summarily suspend the member until the procedures established in the Policy File are concluded. If written charges are not filed within ten days, the suspension shall be terminated."

You are to conduct no Local 1000 business while on suspension.

Sincerely,

A handwritten signature in black ink that reads "Richard Louis Brown". The signature is written in a cursive, flowing style.

Richard Louis Brown  
President  
SEIU Local 1000  
1808 14<sup>th</sup> St. Sacramento, CA 95811  
[RLBrown@seiu1000.org](mailto:RLBrown@seiu1000.org)

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
SOC, CLC

1808 14th Street  
Sacramento, CA 95811

866.471.SEIU (7348)  
[www.seiu1000.org](http://www.seiu1000.org)





**SEIU LOCAL 1000 HEARING REQUEST FORM (HR1)**  
(Complaint for Discipline by a Member against another Member)

Your Name: DLC/Region: Richard Louis Brown

Bargaining Unit: State Department: Bargaining Unit 1; Debt and Investment Advisory Commission

Mailing Address: 3225 43<sup>rd</sup> Street, Sacramento CA 95817

Work Phone: 408-207-2339

Home Phone: 408-207-2339

Complaint Against: Irene Green

SEIU Local 1000/DLC/BUNC Position (i.e., member, DLC President, etc.) Vice President for Bargaining

Policy File Section(s) violated (see Section 9.0.00 et seq. of SEIU Local 1000 Policy File) 9.0.00 DISCIPLINE 9.0.01 Criteria and Procedures for Disciplinary Action Disciplinary action may be taken for the following reasons: (k) Behavior which is determined by the hearing panel or officer to be of such a nature that it causes discredit to Local 1000;

Nature Problem (include specifics – e.g. dates, times, etc. – attach additional sheets if necessary): On Wednesday, February 23, 2022 at 6:08pm an email was sent out exposing that Irene Green was attempting to remove myself, Richard Louis Brown, the President of Local 1000 from my office without any just cause or legal right. This behavior is leading to the discredit of Local 1000.

Witnesses/Documents – please list all witnesses (name and phone number) and relevant documents in your possession: Email from Theresa Taylor to myself on Wednesday, February 23, 2022 at 6:08pm regarding the above mentioned matter. Email from David Jimenez on Thursday February 24, 2022 at 11:09am.

**Headquarters Information:**

Date Received: \_\_\_\_\_ Local 1000 President/Vice Pres.-Sec. Treasurer: \_\_\_\_\_

Referred to Hearing Officer/Panel on: \_\_\_\_\_

Hearing Officer/Panel Assigned: \_\_\_\_\_

Date/Time/Location of Hearing: \_\_\_\_\_

SEIU Local 1000 Action/Date: \_\_\_\_\_

Disposition Letter Mailed: \_\_\_\_\_



From: [REDACTED]  
 Sent: [REDACTED]  
 To: [REDACTED]  
 Subject: [REDACTED]

From: David Jimenez <ssa\_dave04@hotmail.com>

Sent: Thursday, February 24, 2022 11:09 AM

To: Theresa Taylor <thetay456@gmail.com>; leonard.seitz@dot.ca.gov; Andrew Vasicek <andrewvasicek@gmail.com>; Angelique Moreno <angeliquems@aol.com>; Bill Hall <william.r.hall@dot.ca.gov>; Brad Willis <mojavekroc@msn.com>; Brown, Richard <RLBrown@SEIU1000.org>; Carolelynn Leonardo-Valdriz <caroleseiu1000@gmail.com>; Carolyn Leonardo-Valdriz <cleonardo23@gmail.com>; Charity Regalado <lakersgyrl@yahoo.com>; Christina Evitt <christinadlc751@gmail.com>; Cindy Doyel <CindyDoyelUnion@gmail.com>; Cullen <cullenkral@gmail.com>; Cynthia Vo <risewithlabor@gmail.com>; Darrell Kirby <EXCTME@AOL.COM>; Daunette Sparkman <bigdtiggerds69@yahoo.com>; David Johnson <davidrjohnson055@gmail.com>; David Smith <yourunion2019@gmail.com>; DeLeon Secrest <his\_story1865@yahoo.com>; DeLonne Johnson <delonneli@frontiernet.net>; ED Page <dv8yingyang@gmail.com>; Irene Greene <Ireneseiu1000@gmail.com>; Eileen Boughton <Dlc789pres@outlook.com>; Erika Chhatarpal <whitemamba.ev@gmail.com>; Francina Stevenson <rocina@frontiernet.net>; Garth Underwood <seiucl710dbur@yahoo.com>; Heather Kessler <president.dlc788@gmail.com>; Hoang-Van 'Van' Nguyen <van.nguyen\_seiu1000@outlook.com>; Imani Dhahabu <ijdahabu@yahoo.com>; Jack Dean <seiujack.dean@gmail.com>; Jennifer Cordova <cordmama@live.com>; Jerome Washington <Jerome\_wash@sbcglobal.net>; Joycelyn Odom <jbetboopin3@gmail.com>; Karen Franklin <KarenFranklin121@gmail.com>; Karen Jefferies <kjefferies08@gmail.com>; Kerri Riley <kerricriley@icloud.com>; Kevin Healy <healykm@hotmail.com>; Kim Coward <cowart12568@gmail.com>; Latasha Brown <lat\_jin@hotmail.com>; Leonard Seitz <seitz\_l@pacbell.net>; Lisa Davis <kcvwmom@yahoo.com>; Maria Blaine <mariablaine39@gmail.com>; Mary De La Cruz <mdlc056@gmail.com>; Miche Roy <MSMRoy1976@Gmail.com>; Melissa Del Rosario <Mistydelrosario3@hotmail.com>; Monica Rodriguez <moneyrodriguez@hotmail.com>; Nancy Martinez (Contact) <nancymartinez\_6@hotmail.com>; Naomi Musembi-Johnson <musembi.rn@gmail.com>; Neice Davis <neice\_davis@yahoo.com>; Ramon Naverrette <dlc747president@gmail.com>; Richard Wake <rwake61@yahoo.com>; Robert Gilbert <rgilbert.seiu1000@gmail.com>; Ruth Ibarra <dlc787.president@gmail.com>; Ruth Kiker <ruthkiker@charter.net>; Shrhonda Ward <seiucl000dlc766@gmail.com>; Steven Alari <membersfirst@gmail.com>; Susan Rodriguez <rodriguezsusan@hotmail.com>; Tetence Hibbard <terrygh50@hotmail.com>; Tommy Rico <trico60@hotmail.com>; Walls, Anica <awalls@SEIU1000.org>; Wanda Yanez <learnwisdom@sbcglobal.net>; eric\_murray03@msn.com; vseastrongseiu@gmail.com; xicanerv@hotmail.com; chair.seiu1000 <chair.seiu1000@gmail.com>; Nicole Solovskoy <dlc770president@gmail.com>

Subject: Fw: Update to follow

Good Morning all!

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In Solidarity,

David Jimenez  
VP/Secretary Treasurer  
SEIU Local 1000  
(916)690-7418

Anica Walls  
VP Representation/Organizing SEIU Local 1000  
(916)804-5338



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Through solidarity, we can get back on track for the protection of our members and our union. I am with you.

William "Bill" Hall  
Chair of the Board  
SEU Local 1000





February 25, 2022

Via Email

[ireneseiu1000@gmail.com](mailto:ireneseiu1000@gmail.com);

[igreen@seiu1000.org](mailto:igreen@seiu1000.org) &

Certified Mail

7020 2450 0001 2112 3525

Irene Green  
Vice President for Bargaining  
SEIU Local 1000  
1808 14<sup>th</sup> Street  
Sacramento, CA 95818

**RE: SUSPENSION OF OFFICER DUTIES**

Dear Ms. Green,

It has come to my attention that you have met with and provided confidential information to Board of Director Bill Hall in an effort to remove me from my position without any just cause or legal right.

It is my opinion that the above actions pose an immediate threat to the welfare of Local 1000. Therefore, you are hereby suspended under the authority of Local 1000 Policy file section 9.0.03 which states "When, in the opinion of the President, the actions of the member are such as to impose an immediate threat to the welfare of Local 1000, the President may summarily suspend the member until the procedures established in the Policy File are concluded. If written charges are not filed within ten days, the suspension shall be terminated."

You are to conduct no Local 1000 business while on suspension.

Sincerely,

A handwritten signature in black ink that reads "Richard Louis Brown". The signature is written in a cursive, flowing style.

Richard Louis Brown  
President  
SEIU Local 1000  
1808 14<sup>th</sup> St. Sacramento, CA 95811  
[RLBrown@seiu1000.org](mailto:RLBrown@seiu1000.org)

RICHARD  
LOUIS BROWN  
President

DAVID JIMENEZ  
Vice President/  
Secretary-Treasurer

ANICA WALLS  
Vice President for  
Organizing/Representation

IRENE GREEN  
Vice President for Bargaining

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
SOC, CLC

1808 14th Street  
Sacramento, CA 95811

866.471.SEIU (7348)  
[www.seiu1000.org](http://www.seiu1000.org)

~~XXXXXX~~



To: Local 1000 Anne Giese Giese

Feb 26, 2022 at 10:08 AM

Good morning,

On Monday, February 28, 2022, in addition to 1) Yvonne's Cease and Desist letter being emailed and sent by 2 day certified mail after my approval by 2pm and 2) please also send me the list of hearing officers that have been trained by 10am.

Finally as you may know, to protect the interest of SEIU Local 1000, I suspended VP for Organizing/Representation, VPs Anica Walls, David Jimenez. and Irene Green on February 25, 2022. So please immediately remind the suspended VPS



To: Local 1000 Anne Giese Giese

by email and certified mail by 3pm after my today after my approval that they are prohibited from carrying out any official duties including, but not limited to, those duties as described by the SEIU Local 1000 Policy File Section 3.0.03 and Bylaws but their membership is still protected.

Please feel free to cite any other legal references to carry out the effect of suspension imposed against the affected vice presidents.

Thank you,  
Richard Louis Brown  
Local 1000 President  
Create Excellence 7437  
408-206-2339



To: Local 1000 Anne Giese Giese

Feb 27, 2022 at 7:14 PM

Thank you. I'll make sure it's  
done first thing.

24



# 4 WARNING/INFORMATIONAL LETTERS AND EMAILS TO DEFENDANTS AND MS. GIESE



Telephone: (916) 554-1279  
Facsimile: (916) 554-1292

**VIA CERTIFIED MAIL**  
**With Return Receipt Requested**  
**7011 2970 0000 0785 6449**

September 13, 2021

William Hall  
President DLC 744  
4479 Rolling Hills Ln  
Vacaville, CA 95688-9533

RICHARD  
LOUIS BROWN  
President

DAVID JIMENEZ  
Vice President/  
Secretary-Treasurer

ANICA WALLS  
Vice President for  
Organizing/Representation

IRENE GREEN  
Vice President for Bargaining

**RE: PETITION DEMAND FOR THE PRESIDENT TO CALL A  
SPECIAL MEETING OF THE BOARD FOR PROPOSED  
AGENDA ITEMS**

Dear Mr. Hall.

On September 7, 2021, SEIU Local 1000 received your proposed agenda items for your requested special board meeting pursuant to Section 3.2.00(b)(1) of the Policy File. While the letter was addressed to Robert L Brown –we take that to be an error and intended for Richard Louis Brown. Your letter refers to Exhibit 1, which is supposed to attach the Board member affirmations for this request and related to the attached agenda items. Unfortunately, those affirmations were not attached. SEIU Local 1000 cannot speculate on which Board members approved the request for a meeting on these specific items. The Policy File requires the following:

- (b) Upon petition by a majority of the Local 1000 Board of Directors members, the President shall call a special meeting of the Board.
- (1) Such petition shall contain the following information:
  - (i) The specific issue(s) for the proposed agenda and the circumstance(s) or reason(s) such issue(s) cannot reasonably be dealt with at the next regularly scheduled Board meeting;
  - (ii) The potential damage or loss to the Local or its members which is likely to occur if such issue(s) are not resolved at the meeting proposed by the petition;

Thank you for your attention to this letter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Anne M. Giese".

ANNE M. GIESE

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
CTW, CLC

1808 14th Street  
Sacramento, CA 95811

866.471.SEIU (7348)  
www.seiu1000.org





**VIA CERTIFIED MAIL**  
**With Return Receipt Requested**  
**7019 0140 0001 0649 6268**

September 27, 2021

William Hall  
President DLC 744  
4479 Rolling Hills Ln  
Vacaville, CA 95688-9533

RICHARD  
LOUIS BROWN  
President

**RE: PETITION DEMAND FOR THE PRESIDENT TO CALL A  
SPECIAL MEETING OF THE BOARD FOR PROPOSED AGENDA**

DAVID JIMENEZ  
Vice President/  
Secretary-Treasurer

Dear Mr. Hall.

ANICA WALLS  
Vice President for  
Organizing/Representation

On September 23, 2021, I received your requested special board meeting pursuant to Section 3.2.00(b)(1) of the Policy File. I have found your petition to be out of order. It is deficient in a number of areas:

IRENE GREEN  
Vice President for Bargaining

First, Exhibit 1 is purported to be a list of board members that support a special board meeting; however, it is invalid. One of the listed proponents of the items, Beth Bartel, is no longer a board member. This means that you are accounting for votes that are in fact invalid. This gives rise to the assumption that there are more votes being counted that are invalid. It is in the best interest of the organization that the union does an independent investigation into the validity of each board member's position on your petition.

Additionally, DLC President Jerome Washington's name was removed from the list provided in Exhibit 1 following the August 24, 2021 petition but prior to your most recent petition, further undermining the validity of any supposed majority.

Second, in its current form, the demand was not submitted to myself for consideration 24 hours prior to its circulation for signatures as required in Policy File section 3.2.00(b)(2).

Therefore, I will not be calling a special meeting pursuant to your request I received on September 23, 2021.

Thank you for your attention to this letter.

Sincerely,

*Richard Louis Brown 7437*

RICHARD LOUIS BROWN  
President, SEIU Local 1000

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
CTW, CLC

1808 14th Street  
Sacramento, CA 95811

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**VIA CERTIFIED MAIL**  
**With Return Receipt Requested**

October 7, 2021

William Hall  
President DLC 744  
4479 Rolling Hills Ln  
Vacaville, CA 95688-9533

**RE: IMPROPER ATTEMPT TO HOLD SPECIAL MEETING OF THE  
BOARD WITHOUT THE PRESIDENT'S ACTION**

Dear Mr. Hall,

On September 28, 2021, I received your email attempting to notify the SEIU Local 1000 Board members of your ad hoc and improper special board meeting on October 16-17, 2021.

California Corporation Code Section 7211(a) states in relevant part that the bylaws govern when it comes to meetings of the board. Pursuant to Section 3.2.00 of the Policy File only the President may call for a Board meeting. Since your petition goes against the Policy File (and the bylaws) and therefore against the Corporation Code, I have found your petitions to be out of order and deficient. These petitions are further deficient on their face given the fact that a former DLC President misrepresented herself as a current president of her DLC in some of your petitions. In addition, proposals submitted to the board that called for approval of an emergency BOD meeting have been amended and changes have been made to the BOD since the vote. Your attempt to hold a Board meeting is unauthorized. Any actions you attempt to take will be out of order and therefore null and void.

Any Board member who attempts to attend or support this Board meeting will be subject to disciplinary action including suspension for undermining the Union by imposing an immediate threat to the welfare of Local 1000 (Policy File 9.0.01 (j) (k) Intentional disrupting the orderly conduct of an official meeting and 9.0.03 Suspension of Member). Furthermore, action may be taken with the Superior Court to remove any such member from their position pursuant to California Corporation Code Section 12363 and other California Corporation Codes, which hold in part that the Superior Court has authority to remove any director for fraudulent or dishonest acts or gross abuse of authority or discretion with reference to the corporation. This illicitly proposed attempt at a meeting circumventing the correct organizational processes and the underlying improperly proposed policy file and bylaws changes are clearly evidence of violations of said code prosecutable to the furthest extent of the law.

RICHARD  
LOUIS BROWN  
President

DAVID JIMENEZ  
Vice President/  
Secretary-Treasurer

ANICA WALLS  
Vice President for  
Organizing/Representation

IRENE GREEN  
Vice President for Bargaining

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
CTW, CLC

1808 14th Street  
Sacramento, CA 95811

866.471.SEIU (7348)  
www.seiu1000.org



Thank you for your attention to this letter.

Sincerely,

*Richard Louis Brown* 1437  
RICHARD LOUIS BROWN  
President, SEIU Local 1000

cc: SEIU Local 1000 Board of Directors



Sent: Wednesday, October 13, 2021 5:19 PM

To: Giese, Anne <AGiese@seiu1000.org>

Cc: mary delacruz <mdlc056@gmail.com>; Miche Roy <msmroy1976@gmail.com>; Eileen Boughton <Dlc789Pres@outlook.com>; Cheryl Allen <cmsallen768@gmail.com>; Darrell Kirby <exctme@aol.com>; Ramon Navarrete <rnavarrete23@yahoo.com>; David Johnson <davidrjohnson055@gmail.com>; Jack Dean <seiujack.dean@gmail.com>; angeliquems@aol.com <angeliquems@aol.com>; LaTasha Jinnies-Brown <lat\_jin@hotmail.com>; Monica Rodriguez <moneyrodriguez@hotmail.com>; Gmail <yspyg14@gmail.com>; Van Nguyen <Van.Nguyen\_SEIU.Local1000@outlook.com>

Subject: BOD MEETING

Anne,

We are a group of newer DLC Presidents who need clarification regarding the "proposed" BOD meeting "some" board members are proposing to have. Our president has sent us certified letters and an email indicating we could be disciplined for attending. We want to know if the meeting proposed by these few BOD follows the policies and procedures of SEIU local 1000. We are concerned if we do not attend, an action can be done without our presence. We are not seeking your legal COUNCIL only the legality of the proposed BOD meeting without President Browns approval. Thank you in advance Lynda Martin DLC 727 President

From: Van Nguyen <Van.Nguyen\_SEIU.Local1000@outlook.com>

Sent: Wednesday, October 13, 2021 5:29:36 PM

To: lynda <yspyg14@gmail.com>; Giese, Anne <AGiese@seiu1000.org>

Cc: mary delacruz <mdlc056@gmail.com>; Miche Roy <msmroy1976@gmail.com>; Eileen Boughton <Dlc789Pres@outlook.com>; Cheryl Allen <cmsallen768@gmail.com>; Darrell Kirby <exctme@aol.com>; Ramon Navarrete <rnavarrete23@yahoo.com>; David Johnson <davidrjohnson055@gmail.com>; Jack Dean <seiujack.dean@gmail.com>; angeliquems@aol.com <angeliquems@aol.com>; LaTasha Jinnies-Brown <lat\_jin@hotmail.com>; Monica Rodriguez <moneyrodriguez@hotmail.com>

Subject: Re: BOD MEETING

Hello Anne,

I would sincerely appreciate your guidance on the legality of this weekend's Board of Directors' meeting. We did receive a certified letter from President Brown stating that we could be disciplined for attending this weekend's meeting, but we also receive conflicting information stating that the meeting is legal and we will forfeit our vote if we do not attend. Furthermore, I do not believe I receive proper notice for this meeting since I did not receive the survey request asking if I intended to participate. Unequal access to the meeting as a Director seems highly irregular and inappropriate. Please provide your insight and let us know if it is appropriate to attend.

Thank you, Hoang-Van Nguyen DLC 781 President

From: LaTasha Jinnies-Brown <lat\_jin@hotmail.com> Date: Wed, Oct 13, 2021 at 11:01 PM

Subject: Re: BOD MEETING

To: Van Nguyen <Van.Nguyen\_SEIU.Local1000@outlook.com>, lynda <yspyg14@gmail.com>, Giese, Anne <AGiese@seiu1000.org>

Cc: mary delacruz <mdlc056@gmail.com>, Miche Roy <msmroy1976@gmail.com>, Eileen Boughton <Dlc789Pres@outlook.com>, Cheryl Allen <cmsallen768@gmail.com>, Darrell Kirby <exctme@aol.com>, Ramon Navarrete <rnavarrete23@yahoo.com>, David Johnson <davidrjohnson055@gmail.com>, Jack Dean <seiujack.dean@gmail.com>, angeliquems@aol.com <angeliquems@aol.com>, Monica Rodriguez <moneyrodriguez@hotmail.com>

Anne,

I am equally concerned as a DLC President that I received via certified mail, a private letter from our Local, addressed to William Hall, not to myself, signed by our President. Am I to take this certified letter addressed to a single Board member as a form of legal notice from our Local, which you are the Attorney for? Your response to this matter is vital in order for me to carry out my duties and responsibilities to Local 1000, Board of Directors and my membership. I would hate to unknowingly betray my duties.

La Tasha Brown DLC 704 President





November 7, 2021

William Hall,  
President DLC 744  
4479 Rolling Hills Ln  
Vacaville, CA 95688-9533

**RE: IMPROPER REQUEST TO IMPLEMENT AMENDMENTS FROM  
IMPROPER AND OUT OF ORDER BOARD MEETING WITHOUT  
THE PRESIDENT'S ACTION TO CALL A BOARD MEETING**

RICHARD  
LOUIS BROWN  
President

DAVID JIMENEZ  
Vice President/  
Secretary-Treasurer

ANICA WALLS  
Vice President for  
Organizing/Representation

IRENE GREEN  
Vice President for Bargaining

Dear Mr. Hall,

I have received your letter dated October 28, 2021. While I look forward to receiving the documents you refer to in your letter, I do not accept the representations made in your letter, and do not recognize the actions you claim were taken as being valid. There were numerous irregularities and improprieties in the process leading to the meeting and the conduct of the meeting itself. It was not a valid Board meeting and the actions purportedly taken at that meeting were (for those reasons and others) invalid. While the veil of secrecy surrounding the out of order meeting has not yet been lifted, the information that has escaped makes it clear that the meeting was not properly called, noticed, or conducted pursuant to the SEIU Local 1000 Bylaws and Policy File.

The actions taken by a minority of the members of the Board, at a gathering that was not a valid meeting of the SEIU Local 1000 Board and therefore is not effective to amend the Bylaws and Policy File nor overcome the decision of the membership when it elected me President with all of the responsibilities and authority of the position. Any actions aided by legal advice from SEIU International will further violate this invalid meeting.

As you have presented literally no evidence supporting the position that ANY changes were validly made at the October 16th and 17th gathering it is not logical for you to expect me to simply accept your representations. Please submit any information to me for my review no later than December 7, 2021, and I will respond within 30 days once I have had the opportunity to review such information.

Sincerely,

A handwritten signature in blue ink that reads "Richard Louis Brown". The signature is written in a cursive, flowing style.

RICHARD LOUIS BROWN  
President, SEIU Local 1000

SERVICE EMPLOYEES  
INTERNATIONAL UNION  
CTW, CLC

1808 14th Street  
Sacramento, CA 95811

866.471.SEIU (7348)  
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IV. **Relief**

Plaintiff seeks the following relief:

1. **Reinstatement** – Immediate reinstatement as Local 1000 President and immediate reinstatement to California State service with no service limitations along with reinstating 2018 Bylaws and 2020 Policy File with a full reversal of the Plaintiff's illegal suspension/removal from office.
2. **Invalidation** - invalidating ALL actions taken by Local 1000 since February 27, 2022, that includes but is not limited to the 2023-2026 union contract ratification and the 2024 union leadership elections.
3. **Board Removal** – Removal of the Local 1000 Board of Directors along with all DLC Eboard officers and bar ALL of them from all future elections due to their gross intentional misconduct.
4. **Disaffiliation** – Separation from SEIU and CSEA for their roles in supporting actions that undermined a democratic election ALONG with court-ordered policy changes to ensure compliance with Local 1000 Bylaws (2018), Policy File (2020).
5. **Request Jury Trial** - Obtain a jury trial with full disclosure of Plaintiff requested union records.
6. **Monetary Damages** –
  - o **Actual Damages:** \$21 million for emotional distress and reputational harm caused by the actions of the three Defendants. This amount is based on the impact of lost professional standing, career opportunities, and personal suffering. Nullification of ALL penalties/judgments against Plaintiff and financial legal fees reimbursement for Plaintiff.
  - o **Punitive Damages:** Plaintiff seeks punitive damages to deter similar misconduct, given the intentional and egregious nature of the three Defendants' actions. These wrongs are ongoing, as Plaintiff continues to suffer professional and reputational harm due to the Defendants' actions.

V. **Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

February 5, 2025

Signature of Plaintiff

Richard Louis Brown

Printed Name of Plaintiff

Richard Louis Brown



## FIRST AMENDED CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS** Brown, Richard Louis  
3225 43rd Street  
Sacramento, CA 95817

(b) County of Residence of First Listed Plaintiff Sacramento  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Richard Louis Brown - PRO SE LITIGANT  
3225 43rd Street Sacramento, CA 95817

**DEFENDANTS** SEIU Local 1000, Service Employees  
International Union (SEIU), California  
State Employees Association (CSEA)

County of Residence of First Listed Defendant Sacramento  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known) Leon Dayan/Kara Naseef - SEIU,  
Catha Worthman/Darin Ranahan - SEIU Local 1000  
Glenn Rothner - SEIU

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 2 U.S. Government Defendant  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District  
☐ 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

US Constitution - 1st, 8th, 14th, 15th Amendments, Federal Rules of Civil Procedure Rule 8(f)

Federal laws violated due violations to Local 1000 internal governance/California state laws.

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S)** (See instructions):

IF ANY

MAGISTRATE JUDGE Jeremy D. Patterson

DOCKET NUMBER 2:24-cv-03276-DJC-JDP

DATE  
February 5, 2025

SIGNATURE OF ATTORNEY OF RECORD

Richard Louis Brown

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_